

EXHIBIT 8

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

CHELSEA GILLIAM, *et al.*,

*

Plaintiffs,

*

v.

Civil Action No. 1:23-cv-1047

*

DEPARTMENT OF PUBLIC SAFETY
AND CORRECTIONAL SERVICES, *et al.*, *

Defendants.

*

* * * * *

EXPERT DECLARATION OF DR. ISABEL S. LOWELL, M.D., M.B.A.

I, Isabel S. Lowell, M.D., M.B.A., hereby declare and state as follows:

1. I am over the age of 18, of sound mind, and in all respects competent to testify.
2. I have been retained by counsel for Plaintiff Chloe Grey as an expert in connection with the above-captioned litigation.
3. I have actual knowledge of the matters stated herein. If called to testify in this matter, I will testify truthfully and based on my expert qualifications and opinions.
4. I am offering my expertise in support of Ms. Grey's claims against the Maryland Department of Public Safety and Correctional Services (DPSCS) and its agents for injuries against her person resulting from the denial of medically necessary gender-affirming care in connection with her diagnosis of gender dysphoria.

EXPERT OPINIONS

5. As outlined in my February 23, 2024 Declaration, hair removal is an essential part of gender-affirming care for transgender women.

6. There are several options available for effective hair removal treatment.

7. Laser hair removal is the “first line” treatment for hair removal, meaning it is the overall best option for transgender women. It is an FDA-approved treatment using light (a laser beam) to selectively target the root of the hair, destroying the hair follicle. It works best for dark hair, and is needed every 4-8 weeks, since the hair does grow back.
8. Electrolysis, the next best treatment, uses an electrical current to destroy hair follicles. Benefits are that it works for all hair colors, but the main drawback is that it is typically needed on a weekly basis.
9. Another option is epilation. Epilation is the complete removal of the hair follicle and root achieved by pulling it out. Epilation treatments are typically needed every 2-4 weeks. Waxing is an example of epilation. There are also small hand-held electric epilator devices for home use that remove hair using tiny rotating tweezer-like discs. They are typically the same size or smaller than an electric shaver, but do not contain blades of any kind nor sharp surfaces. Epilators can be purchased online from brands such as Braun or Philips, for approximately \$30-50.
10. Depilatory creams: there are many over-the-counter depilatory (hair removal) products available, such as Nair, Softsheen, or Nad’s (which works well for coarse hair), among others. All depilatory products use some version of the same ingredient, Thioglycolic Acid. This is a compound that breaks the disulfide bonds in keratin (a helical protein that forms hair, nails, and some components of the skin and scar tissue) and hydrolyzes the hair so that it can be easily removed. These products are considered very safe when used as directed.
11. Most depilatory creams are used for only a few minutes, typically 3-10 minutes at

most. They should be used once every 3-5 days. Given the short duration and frequency of treatment, Ms. Grey may only need access to the product for 5 minutes every 3-5 days. If there is any concern for misuse, it would seem reasonable that it could be kept safely elsewhere except during these brief treatment periods.

12. Healthcare providers recommend facial hair inhibitors in addition to the hair removal methods listed above.

13. Because Vaniqua—a facial hair inhibitor—is no longer on the market, providers suggest getting finasteride 0.25% cream from a compounding pharmacy.

14. I would recommend Laser hair removal as the most optimal treatment for Ms. Grey, or any other transgender woman. However, given the safety, low cost, and ease of use with epilation devices or depilatory creams, these treatments seem feasible in a carceral environment. Such hair removal methods are most effective when used in conjunction with a facial hair inhibitor.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: March 17, 2024


Isabel S. Lowell, M.D., M.B.A.